

# **EXHIBIT A**

## DISPUTED CLAIM TERMS AND CONSTRUCTIONS

U.S. Patent No. 10,177,551					
Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
Claim 1 Claim 19	"[element or assembly] structured to [verb]" ( <i>Plaintiff</i> )	The identified element or assembly is a structure that is shaped, sized, disposed, coupled and/or configured to perform, and is intended to, and designed to, perform the identified verb.	'551 Patent (Exhibit B)  Specification:  <u>Column:Line</u> 3:36-50.	Plain and ordinary meaning; no construction required.  To the extent construction is required, CAB's proposed construction renders the claims indefinite.	'551 Patent (Exhibit B): Abstract; Figures 1-12; Claims 1-19; 1:1-2:30; 10:8-61; 11:31-60  '551 Patent Prosecution History (Exhibit D): Appellant's Brief on Appeal, 7/12/2018, pp. 1-28 (CAB_000333-360)
Claims 1, 10, 19	"multi-function line assembly" ( <i>Defendant</i> )	"An assembly that includes a multi-function line and may further include terminal ends that include a conductive or non-conductive terminal support structured to	'551 Patent (Exhibit B)  Specification  <u>Column:Lines</u> • 3:19-27; • 7:6-62;	Indefinite  <i>If not indefinite:</i>  "a multifunction line with thimble eye terminal ends each defining an	'551 Patent (Exhibit B): Abstract; Figures 1-6; Claims 1-19; 2:24-42; 2:48-57; 7:6-62;

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		couple a multi-function line to a support and draw the multi-function line taut.”	<ul style="list-style-type: none"> <li>Figs. 3-6.</li> </ul>	aperture through which the ends of the multi-function line are passed and coupled to itself.”	11:18-23  '551 Patent Prosecution History (Exhibit D): Office Communication, 3/8/2018, pp. 1-7 (CAB_000434-440); Response and Amendment, 3/22/2018, pp. 6-16 (CAB_000417-427); Office Communication, 5/17/2018, pp. 3-7 (CAB_000403-407); Response and Amendment, 5/31/2018, pp. 5-19 (CAB_000383-397); Appellant's Brief on Appeal,

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Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
					7/12/2018, pp. 1-28 (CAB_000333-360); Notice of Allowance, 10/24/2018, p. 3 (CAB_000325);  PTAB Filings: IPR2024-00139-14 (Exhibit E), pp. 15-23, 32-36, 41-62, 64-65. IPR2024-00139-14-EX2001 (Exhibit F).
Claim 1  Claim 19	"multi-function line" ( <i>Plaintiff &amp; Defendant</i> )	a tension member (i.e., robust wire or cable structure) that supports current wires and/or cable hangers, as a messenger wire, and which provides a current path, as a grounding conductor	'551 Patent (Exhibit B)  Specification:  <u>Column:Line</u> 1:24-28, 60-65; 1:67-2:3; 2:27-42; 7:17-23;	Indefinite  <i>If not indefinite:</i>  "a tension member that supports current wires and/or cable hangers, and, which is	'551 Patent (Exhibit B): Abstract; Figures 1-12; Claims 1-19; 1:17-35; 1:50-2:20; 2:27-44; 2:52-3:15; 7:6-9:46;

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Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
			8:45-46, 8:60-9:39; 11:65-67  <b>'551 Patent File History (Exhibit D):</b>  Notice of Allowability , 10/24/2018 (CAB_000323-326); Appellant's Brief on Appeal, 7/12/2018 (CAB_000333-360); Patent Owner's Response and Amendment, 5/31/2018 (CAB_000379-397); Office Action Summary, 5/17/2018 (CAB_000400-	conductive.”	10:31-11:30; 11:61-67.  '551 Patent Prosecution History (Exhibit D): Office Communication, 3/8/2018, pp. 1-7 (CAB_000434-440); Response and Amendment, 3/22/2018, pp. 6-16 (CAB_000417-427); Office Communication, 5/17/2018, pp. 3-7 (CAB_000403-407); Response and Amendment, 5/31/2018, pp. 5-19 (CAB_000383-397); Appellant's Brief

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Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
			409).  <b>PTAB Filings:</b>  IPR2024-00139-14 (Exhibit E), p.15-23, 32-36. IPR2024-00139, EX 2001 (Exhibit F), ¶55-76.		on Appeal, 7/12/2018, pp. 1-28 (CAB_000333-360); Notice of Allowance, 10/24/2018, p. 3 (CAB_000325);  PTAB Filings: IPR2024-00139-14 (Exhibit E), pp. 15-23, 32-36, 41-62, 64-65. IPR2024-00139-14-EX2001 (Exhibit F).
Claim 2  Claim 19	“each said multi-function line coupling defines a conductive path” <i>(Plaintiff)</i>	Each said multi-function line coupling provides a grounding path for a grounding conductor.	<b>'551 Patent (Exhibit B)</b>  <b>Specification:</b>  <u>Column:Line</u>  2:3-4, 27-33; 8:8-34; 9:30-46;	Indefinite  <i>If not indefinite:</i>  “each said multi-function line coupling defines a route through which electricity can travel”	'551 Patent (Exhibit B):  Abstract; Figures 1-12; Claims 1-19; 1:23-2:42; 2:52-3:15; 5:13-34; 6:52-10:43; 10:62-11:30;

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Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
			10:31-42; 11:61-67.		11:43-67  '551 Patent Prosecution History (Exhibit D): Office Communication, 3/8/2018, pp. 3-7 (CAB_000436- 440); Response and Amendment, 3/22/2018, pp. 6- 16 (CAB_000417- 427); Office Communication, 5/17/2018, pp. 3-7 (CAB_000403- 407); Response and Amendment, 5/31/2018, pp. 5- 19 (CAB_000383- 397); Appellant's Brief on Appeal,

U.S. Patent No. 10,177,551					
Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
					7/12/2018, pp. 1-28 (CAB_000333-360) pp. 1-28; Notice of Allowance, 10/24/2018, p. 3 (CAB_000325);  PTAB Filings: IPR2024-00139-14 (Exhibit E), pp. 14-18, 34-36, 48-51, 54, 58-61. IPR2024-00139-14-EX2001 (Exhibit F).
Claim 19 (Preamble)	"A mounting assembly for a grounding system structured to ground a number of cables supported by a support assembly, said support assembly including a plurality of spaced conductive piles, said grounding system	The Preamble of Claim 19 limits the claimed mounting assembly to a mounting assembly for a grounding system comprising structures that are shaped, sized, disposed, coupled and/or configured to ground, and are intended	<b>'551 Patent (Exhibit B)</b>  <b>Claim Language:</b>  <u>Column:Line</u>  13:16-21, 24-25, 28-31	Not limiting.  <i>If limiting:</i>  CAB's proposed construction renders the claim indefinite.	'551 Patent (Exhibit B):  Abstract; Figures 1-12; Claims 1-19; 2:24-44; 6:52-9:29 9:60-10:7; 10:43-11:60; 12:1-9.



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	including a multi-function line assembly with a multi-function line" ( <i>Plaintiff</i> )	to, and are designed to, ground a number of cables supported by a support assembly, where the support assembly includes a plurality of spaced, conductive piles, and where the grounding system includes a multi-function line assembly with a multi-function line.	<b>Specification:</b> <u>Column:Line</u> 1:1-2:44; 3:36-50; 9:30-59; 10:8-42; 11:61-67.		

U.S. Patent No. 11,349,291					
Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
Claim 1 (Preamble)	<p>"A system for organizing a plurality of electrical cables extending from a plurality of solar panels"</p> <p><i>(Plaintiff)</i></p>	The Preamble of Claim 1 limits the claimed system to a system for separating from each other DC cables, AC cables and data carrier cables extending from a plurality of solar panels.	<p><b>'291 Patent (Exhibit C)</b></p> <p><b>Claim Language:</b></p> <p><u>Column:Line</u></p> <p>Claim 1 (10:24-37).</p> <p><b>Specification:</b></p> <p><u>Column:Line</u></p> <p>1:20-56; 2:1-9; 3:58-4:2; 4:63-67; 5:4-11; 7:14-17; 10:2-9; Figs. 1-4, 23.</p> <p><b>'291 Patent File History (Exhibit G):</b></p> <p>Corrected Notice of Allowability, 4/25/2022 (CAB_000027);</p>	<p>Not limiting.</p> <p><i>If limiting:</i></p> <p>Plain and ordinary meaning, i.e., "organizing [a / the] plurality of wiring that conducts current or signals extending from [a / the] plurality of solar panels"</p>	<p>'291 Patent (Exhibit C):</p> <p>Claim 1</p> <p>'291 Patent: Abstract; Figures 1-8, 13-27; Claims 1-5, 9, 10, 14-18, 21-22 1:16-4:35; 4:36-5:12; 5:13-10:22.</p> <p>PTAB Filings: IPR2024-00178-17 (Exhibit H), pp. 8-10, 33-36; IPR2024-00182-15-2001 (Exhibit I) ¶¶ 32, 39, 47, 54, 55; IPR2024-00178-17-3002 (Exhibit J); IPR2024-00178-17-3003 (Exhibit K).</p>

U.S. Patent No. 11,349,291					
Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
			<p>Notice of Allowability, 4/6/2022 (CAB_000044);</p> <p>Patent Owner Response, 3/16/2022 (CAB_000081-CAB_000091);</p> <p>Office Action Summary, 12/16/2021 (CAB_000095-CAB_000109).</p>		
Claims 1, 9, 14, 21, 22	"cable hanger" (Defendant)	Plain and ordinary meaning: "a hanger used to support, by a messenger wire, a plurality of electrical cables extending from a plurality of solar panels."	<p><b>'291 Patent (Exhibit C)</b></p> <p><b>Claim Language</b></p> <p><u>Column:Line</u></p> <p>Claims 1-25 (10:24-13:8).</p> <p><b>Specification</b></p> <p><u>Column:Lines</u></p> <p>Abstract; 1:18-62;</p>	"cable hanger comprising a flexible wire of shape retention material"	<p>'291 Patent (Exhibit C):</p> <p>Abstract; Figures 1-27; Claims 1-5, 9, 10, 14-18, 21-22; 3:15-4:35; 5:13-10:22.</p>

U.S. Patent No. 11,349,291					
Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
			<b>Related Patents</b> Pat. No. 9,722,405 (Exhibit L)		
Claim 9, 21	“a formation structured to support a data carrier” <i>(Defendant)</i>	Plain and ordinary meaning: “a cable carrying surface capable of supporting a data carrier.”	<b>'291 Patent (Exhibit C)</b>  <b>Claim Language</b>  <u>Column:Line</u>  Claims 9, 10, 21, 22 (11:15-20, 12:23-31).  <b>Specification</b>  <u>Column:Lines</u> 3:58-4:2.  <b>PTAB Filings:</b> IPR2024-00182-15 (Exhibit M), p. 1-17; IPR2024-00182, EX	“an integrated closed loop on the top of the hanger structured to retain data carriers at least one inch away from power cables”	‘291 Patent (Exhibit C): Abstract; Figures 1-8, 13-17, 19, 20, 26; Claims 1, 9, 10, 14, 21, 22; 1:32-56; 3:58-4:2; 5:13-7:67; 8:26-9:39; 9:44-51; 10:18-19.  PTAB Filings: IPR2024-00182-15 (Exhibit M), pp. 4, 9, 14-17, 26; IPR2024-00182-

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Claim No(s).	Claim Terms/Phrases	Plaintiff's Proposed Construction	Plaintiff's Citations	Defendant's Proposed Construction	Defendant's Citations
			2001 (Exhibit I), ¶¶64-79, 93-110.		15-2001 (Exhibit I), ¶¶39-116.
Claim 1  Claim 14	"cable carrier divider" <i>(Defendant)</i>	Plain and ordinary meaning: "a portion of the cable hanger formed between and separating each of the plurality of cable carrying surfaces."	<p><b>'291 Patent (Exhibit C)</b></p> <p><b>Claim Language</b></p> <p><u>Column:Line</u> Claims 1-5 (10:24-48), 8-18 (11:11-55, 20-23 (12:19-35).</p> <p><b>Specification</b></p> <p><u>Column:Lines:</u> 1:32-56; 6:21-25, 65-67; 7:29-32, 45-46, 49-52, 54-58, 61-64; 10:2-8. Figs. 1-4, 7-8, 14-17, 20, 23, 26.</p> <p><b>PTAB Filings:</b> IPR2024-00182-15 (Exhibit M), p.11-17; IPR2024-00182, EX 2001 (Exhibit I),</p>	"cable carrier divider formed of a wire that has been bent into shape"	<p>'291 Patent (Exhibit C): Figures 1-8, 19, 23; Claims 1-5, 9, 10, 14-18, 21-22; 3:16-4:34; 5:13-7:67; 9:44-45; 9:59-10:9.</p> <p>PTAB Filings: IPR2024-00182-15 (Exhibit M), pp. 16-17; IPR2024-00182-15-2001 (Exhibit I), ¶¶77-79.</p>

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			¶¶64-79.		